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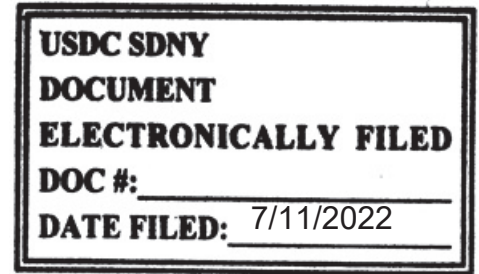
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July 8, 2022

Via ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: Barreto Pelon, et al v. Gabi Operating Corp., et al
Docket No.: 19-cv-00502 (RWL)

Your Honor:

Our office represents Plaintiffs in the above-referenced matter. I write to respectfully request a brief extension of time to file all materials necessary for preliminary approval of a Rule 23 class-wide settlement, from today, Friday, July 8, 2022, to Wednesday, July 13, 2022. Defendants consent to the within request but will not take a position otherwise.

Counsel for the parties have nearly finalized their proposed Rule 23 Class Action Agreement ("Agreement") and have a scheduled teleconference on Monday morning to discuss the outstanding non-monetary issues. Further, our office scheduled meetings with Plaintiffs for early next week, to be held both in-person and remotely, for them to review and sign the Agreement.

Plaintiffs apologize to the Court for having to submit the within application and understand Your Honor is only inclined to grant an additional extension under compelling circumstances. The parties have worked diligently to finalize the Agreement, the negotiation of which has been hard fought and lengthy. The brief extension requested herein should give the parties enough time to finalize the remaining non-monetary terms of the Agreement and for our office to meet with Plaintiffs.

Plaintiffs thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ William K. Oates
William K. Oates Esq.
CSM LEGAL, P.C.
Attorneys for Plaintiffs

cc: Ilan Weiser, Esq. (via ECF)
Attorney for Defendants

SO ORDERED:

7/11/2022
HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE